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October 21, 2024

**VIA EMAIL AND EFILING:**

AUSA Gillian Kassner  
AUSA Kayla Bensing  
AUSA Devon Lash  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: *U.S. v. Cherwitz, et al.*, No. 23-cr-146 (DG)

Dear Counsel:

The defendants, Nicole Daedone and Rachel Cherwitz hereby provide notice pursuant to Fed. R. Crim. P. 16(a)(1)(G) and Fed. R. Evid. 702, 703 and 705 that, at trial, they anticipate calling the following experts:

Dr. David J. Ley Jr., Ph.D ABPP  
Dr. Marty Klein, Ph.D  
Dr. Daniel Kreigman, Ph.D  
Dr. Robert A. Leonard, Ph.D, Linguist

The defendants hereby provide additional materials related to the aforementioned expected testimonies which is appended to this letter. The defendants reserve the right to supplement this disclosure with additional information, particularly since there has been no §3500 production as of today's date. Moreover, the appropriateness and admissibility of expert testimony relies largely on motions *in limine* which have not yet been ruled upon and may require the disclosure of additional experts. Moreover, the government has not yet identified its proposed exhibits which may result in the need to disclose additional experts.

The defendants also reserve the right to call additional and/or substitute expert witnesses. The defendants will comply with Federal Rule of Criminal Procedure 16(a)(1)(G) and Federal Rules of Evidence 702, 703 and 705, and notify you in a timely fashion of any additional or substitute experts that the government intends to call at trial and provide you with a summary of the experts' opinions.



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Respectfully Submitted,

/s/JENNIFER BONJEAN

*One of the attorneys for Nicole Daedone*

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/s/ IMRANA ANSARI

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